

EXHIBIT 8

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Grant Johnson,

Plaintiff,

Civil Action

Docket No. 1:22-cv-10861

v.

Esports Entertainment Group, Inc.,

Defendant.

PLAINTIFF'S ANSWERS TO INTERROGATORIES

1. Identify all witnesses with knowledge of documents or information relevant to the allegations in Plaintiff's Complaint.

ANSWER:

1. Grant Johnson
2. Damian Mathews
69 De Luene Ave, Tindalls Beach Wangararaoa Auckland New Zealand
3. Stuart Tilly
87 Luton Rd Harpenden, Herts, AL5 3BL UK
44 (0) 7791 001 029
4. Alex Lim
415-903, 61 Hi-Park 3-ro Ilsanseo-gu, Goyang-si, Gyeonggido, Korea 411-809
82-10-4653-9607
5. Mark Neilsen
6. Kaitesi Munroe
330 Angelo Cefellie Dr Apt 318 Harrison NJ 07029
(201) 360-7671
7. Alan Alden
202 Yucca, Triq Is-Swieql, Malta SWQ 3454
8. Daniel Marks
21 Lockwood Rd, Riverside CT 06878
1-(203) 979-1750
9. Warwick Bartlett
Rose Cottage, 28 Bowling Green Rd Castledown, Isle of Man IM9 1EB
01624 823886
0762 448391
10. Jenny Pace
IL-Pajazza Block D Floor 6 Triq BirBal Mal Balzan Malta
11. John Brackens

2 triq- Is-Simar The Terraces Apt 7A Xemxija, St. Paul's Bay Malta SPB 9026
12. Michael Villani
84 Festival Court, NY 10603
13. Greg Page
1750 FM423 Apt 822, Frisco, TX 75033
14. Waqas Khatri
Alto Fund address-1180 Avenue Of Americas, Suite 842, New York, NY, 10036, United States
1 646-793-9056
15. Joseph Lucosky
111 Broadway, Suite 807, New York, NY 10006
(732) 395-4402
(212) 417-8160
16. Jon Uretsky
Phillipson & Uretsky - 111 Broadway 8th Floor New York, NY 10008
17. Anna Adelstein
Phillipson & Uretsky - 111 Broadway 8th Floor New York, NY 10008
18. Willem VanderBerg
601 Route 73 North, Suite 400, Marlton NJ 08053
19. Justin VanFleet
601 Route 73 North, Suite 400, Marlton NJ 08053
20. Lydia Roy
9595 Highland Pointe Pass Delray Beach, Florida 33446

2. Identify all witnesses with knowledge of documents or information relevant to Plaintiff's communications with Ayrton.

ANSWER:

1. Grant Johnson
2. Damian Mathews.
3. Stuart Tilly.
4. Alan Alden.
5. Daniel Marks.
6. Jon Uretsky.
7. Joseph Lucosky.

3. Identify all of Johnson's "Affiliates" as referenced in section 4.11(d) of the Securities Purchase Agreement, annexed as Exhibit D to the Complaint.

ANSWER:

Plaintiff objects because this interrogatory is outside of the scope of Local Rule 33.3(a). This interrogatory does not seek the names of witnesses with knowledge of relevant information, a computation of damages, or the existence, custodian, location, or general description of relevant documents.

4. Identify all witnesses with knowledge of documents or information relevant to Plaintiff's vote with respect to Defendant's transaction with Ayrton, as referenced in Paragraph 21 of the Complaint.

ANSWER:

1. Grant Johnson.
2. Daniel Marks.
3. Michael Villani.

5. Identify all trustees and beneficiaries of the Next Generation Holdings Trust at all times between January 1, 2021 and December 3, 2022.

ANSWER:

Beneficiary(s): Grant Johnson.
Trustee(s): Marcos Almeida.

6. Identify all persons who had the ability to exercise control over the Next Generation Holdings Trust at all times between January 1, 2021 and December 3, 2022.

ANSWER:

Marcos Almeida.

7. Identify any documents used in responding to any of the Interrogatories contained herein.

ANSWER:

Plaintiff will produce any such documents.

8. Identify all documents and written communications relevant to the allegations in Plaintiff's Complaint.

ANSWER:

Plaintiff will produce any such documents.

9. Identify all documents relevant to Plaintiff's allegations concerning his claim that Defendant allegedly failed to pay him agreed-upon compensation, including base salary and bonuses.

ANSWER:

Plaintiff will produce any such documents.

10. Identify all documents relevant to Plaintiff's allegations concerning his claim that he has suffered damages as a result of Defendant's alleged defamation.

ANSWER:

Plaintiff will produce any such documents.

11. Set forth the total amount of monetary damages Plaintiff contends he is owed in this action and explain how said sum is calculated.

ANSWER:

- a. Bonus for the year 2021 (section 3.03 – derived from table in section 3.03 based on achieving revenues of \$16,783,914 against a target of \$13,000,000): \$450,000
- b. Stock (section 3.04): \$1,150,000.
100,000 shares which would have been registered by July 2021 at a price of \$10.50 per share, and 100,000 shares which would have been registered in March 2022 at a price of \$1 per share.
- c. Salary (section 3.01 – base compensation of \$300,000 plus 3% annual increases through the end of Plaintiff's initial term as provided in article I):
2021: \$9,000.00.
2022: \$18,273.00
2023: \$337,655.00
2024: \$347,765.00
\$712,693.00
- d. Car (section 4.03):
2022: \$800.00.
2023: \$9,600.00.
2024: \$9,600.00.
\$20,000.00
- e. Life insurance (section 4.06):
2020: \$1,932.00
2021: \$1,932.00
2022: \$1,932.00
2023: \$1,932.00
2024: \$1,932.00
\$9,660.00
- f. Tax accounting (section 4.08):
2020: \$2,700.00
2021: \$2,700.00
2022: \$2,700.00
2023: \$2,700.00
2024: \$2,700.00
\$13,500.00
- g. Tax planning (section 4.08):
2022: \$14,946.00

h. Vacation (section 4.02):

2023: \$32,466.00

2024: \$33,438.00

\$65,904.00

i. Personal days (section 4.02):

2023: \$6,493.00

2024: \$6,687.00

\$13,180.00

Total (a + b + c + d + e + f + g + h + i): \$2,449,883

Plaintiff is also entitled to an award of attorney's fees under section 9.02 of the Employment Agreement, plus interest and costs of suit.

Finally, Plaintiff is entitled to damages for his defamation claim.

Respectfully submitted,

/s/ Alan L. Frank

Alan L. Frank, Esq.

Alan L. Frank Law Associates, P.C.

45 Broadway, Suite 720

New York, NY 10006

And

135 Old York Road

Jenkintown, PA 19046

215-935-1000

215-935-1110 (fax)

afrank@alflaw.net

Counsel for Plaintiff

June 20, 2023

VERIFICATION

I, Grant Johnson, hereby verify that my Answers to Interrogatories of June 20, 2023 are true to the best of my knowledge and belief.

June 23, 2023



Grant Johnson